

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

3M COMPANY,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 1:11cv627 (TSE/JFA)
)	
CHRISTIAN INVESTMENTS LLC, D/B/A)	
PROTECTED DOMAIN SERVICES, et al.,)	
)	
Defendants.)	
_____)	

PLAINTIFF'S APPLICATION FOR ATTORNEY FEES

Plaintiff 3M Company ("3M"), by counsel, files this application for attorney fees in accordance with Judge Ellis's Order dated March 6, 2012 and Rule 54(d), Fed. R. Civ. P. In support of its application, 3M states as follows:

1. On March 6, 2012, the Court entered its Final Order and Judgment against Defendants KC, John B. LeStrange, 3MBKK, Wattana, MS, Tharinee Pinidrak, and Arthit ("Judgment") in favor of 3M. The Court included awards of reasonable attorney's fees and costs against each of these Defendants.

2. 3M has incurred attorney fees and disbursements totaling approximately \$8,466.78 per Defendant (excluding fees for preparing this Application for Attorney Fees) in connection with this case for each of these seven Defendants, for a total of \$59,267.47 for all seven Defendants. *See* Declarations of William G. Barber and Timothy J. McEvoy, attached hereto as Exhibits 1 and 2.

3. Invoices attached to Exhibits 1 and 2 detail the fees and disbursements incurred by 3M chronologically by task, providing timekeeper name, date, and hours expended on each

particular task. Exhibits 1 and 2 certify that the hours recorded were actually expended on the tasks stated, and provide evidence that the hours expended and rates charged were reasonable and consistent with prevailing market rates for intellectual property litigation.

4. Additionally, Exhibits 1 and 2 and their attachments set forth the method by which the amount of fees was computed in sufficient detail to permit the Court to verify that the hours claimed were reasonably expended on the litigation. This includes detailed time entries for each attorney for whom fees are claimed.

5. 3M's counsel redacted narratives that did not concern the seven specific Defendants covered by the Judgment (e.g., settlement discussions with other Defendants) and reduced the time entries and fees accordingly. Counsel then divided the remaining fee total by 25, the number of total Defendants in this case. The resulting figure is very conservative, as certain tasks were specific to these seven Defendants (e.g., all tasks concerning the motion for default judgment), yet they were still divided by 25.

6. As detailed in Exhibits 1 and 2, the hours expended on this case were reasonable and necessary, and the hourly rates are reasonable in light of 3M's counsel's extensive experience, reputation, and ability in the specialized field of trademark litigation.

Conclusion

3M is entitled to recover from KC, John B. LeStrange, 3MBKK, Wattana, MS, Tharinee Pinidrak, and Arthit, its reasonable attorney fees and costs for this litigation. 3M requests the Court enter an Order awarding it \$8,466.78 against each of these seven Defendants, for a total of \$59,267.47 for all seven Defendants.

DATED: March 20, 2012

Respectfully submitted,

/s/

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Sean Patrick Roche, VSB No. 71412
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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of March 2012, I have served true and correct copies of: (1) Plaintiff's Application for Attorney Fees against Defendants KC, John B. LeStrange, 3MBKK, Wattana, MS, Tharinee Pinidrak, and Arthrit, (2) Declaration of William G. Barber, and (3) Declaration of Timothy J. McEvoy, with exhibits, via United States mail, postage prepaid, to the following Defendants:

Directi Internet Solutions Pvt. Ltd., D/B/A Publicdomainregistry.com, and D/B/A Privacyprotect.Org

Directiplex, Next to Andheri Subway
Old Nagardas Road
Andheri (East)
Mumbai, Maharashtra 400069
India

Whoisprotection.cc

Lot 2-1, Incubator 1, Technology Park Malaysia
Bukit Jalil
Kuala Lumpur, Wilayah Persekutuan
Malaysia 57000

Marcos A/K/A 3M Specialist

323 Srilankamatan Road
Columbo
Columbo, Sri Lanka 52211

Hoon Hoe Lau

Eitak Enterprise Limited
406, New Village, Ayer Tawar
Perak Malaysia 32400

Hyper

Chanapai Tangneam
13 Moo 7 Sao Thong Hin,
Bangyai, Nonthaburi 11140,
Thailand

Pramote Polchocke

Prachachuen Bangsue
Bangkok, 10800
Thailand

Bettinghouse99

Siriwatd 144/16 bkk
bkk, Chon Buri
10900, Thailand

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P.L.L.C.

Luca Toni A/K/A Luca Tony
Fiorentina
Italian Street
Genoa City, Genoa, Italy 66666

I further certify that I served the following Defendants via email, pursuant to the Court's October 3, 2011, Order, and United States mail, postage prepaid:

K.C.
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Blacktown, Victoria 3600
Australia

John B. LeStrange
154/11
Warsaw, 01-747
Poland

3MBKK
Mario Beraheg
115/6 wipawadeerugsit Road
Dindane
Dindane, Bangkok 10400
Thailand

Arthrit
SSS Company
Bangkok
Sa Kaew Sa Kaeo
Thailand 27120

Wattana
Sudtiangtae, 111
Hangdong, Chaingmai
Thailand 50230

Tharinee Pinidrak
570 Khannayao
Bangkok 10230
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/s/

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